

Exhibit 1

Arizona Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

Search Terms: Meta made its most recent counterproposal on November 29, 2024 to the Arizona (i) Board of Education, (ii) Department of Education, and (iii) Department of Child Safety and offered the same as an initial proposal to the (iv) Department of Health Services. At a high level, Meta’s proposal involves using search strings that require a combination of the following search term categories. So, for example, a document would have to include one of the “Social Media/Device Terms” and a “Youth Term” to be included in the review process, etc.

- Social Media/Device Terms AND Youth Terms
- Youth Terms AND Harm or Wellbeing Terms
- Youth Terms AND Other Terms

#	Social Media/Device Terms
1	"social media" OR "social network" OR Meta OR Facebook OR Instagram OR Insta OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR wire OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR device* OR iphone* OR android OR phone* OR screen OR cell* OR internet OR video OR videogame OR gaming OR apps OR Ipad OR tablet OR laptop OR computer OR chromebook
	Youth Search Terms
2	((gen OR generation) w/2 (alpha OR "z"))
3	teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR U18 or “under 18”
4	scholar* OR School* OR student* OR pupil* OR grade* freshman OR freshmen OR sophomore* OR junior*
5	ACE*
	Harm or Wellbeing Terms
6	advers* w/10 experience* OR ACE*
7	(bodies OR body) w/3 (mass* OR shape* OR fat* OR image* OR thin* OR skinny OR slim* OR acceptance OR dissatisfaction OR positivity OR image OR dysmorph*)

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

8	(negativ* OR compar*) w/3 (appearance OR experience OR affect* OR effect* OR social OR other*)
9	"BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge
10	(eat* OR sleep*) w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)
11	bully* OR bullie* OR cyberbull* OR harass* OR sextort*
12	transphob* OR homophob* OR racis* OR sexis* OR (gender w/10 (dysphoria OR iden*))
13	suicid* OR unalive OR cutting* OR selfharm OR "self-harm" OR NSSI OR “non-suicidal self injury” OR sad* OR reclus* OR (self w/3 (harm OR esteem OR control OR injur* OR mutilat* OR regulat*))
14	svap* OR "ecig" OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul
15	(compuls* OR problem* OR addic* OR overdos* OR excess* OR increas*) w/3 (use* OR using OR usage)
16	dopamine
17	(mental w/3 health) OR "TMH" OR (psych* w/10 (concern* OR issue*))
18	"negative spiral"
19	"social reward*" OR "social approval"
20	“risk factor*” OR “protective factor*”
21	"social connectedness" w/10 (limit* OR decrease* OR less*)
22	danger* OR warn*
23	wellness* OR wellbeing OR "well-being" OR empath* OR compassion*
24	confidence OR "self-confidence"
25	health w/5 (interact* OR behavior* OR online)

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

26	technology w/5 (responsible OR health*)
27	serious w/5 (concern* OR issue OR situation*)
28	emotion* w/5 (abuse* OR support OR regul*)
29	violen* OR abus* OR assault* OR fight* OR altercation OR killchallenge OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR groom* OR hookup* OR solicit* OR pedophile* OR predator* OR sex* OR extort OR exploit*
30	NCII OR “non-consensual intimate imagery” OR CSEC OR CSAM OR NCOSE OR NCMEC
31	“internet crime*” or ICAC
32	(hate*) w/25 (crime OR attack* OR conduct* OR misconduct*)
33	therap* OR counsel* OR treatment* OR inpatient
34	"attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR anxi* OR stress* OR depress* OR insomnia OR ((personality OR behavior*) w/3 (disorder* OR concern* OR issue* OR health* or delinquent))
35	"SSRI" OR "SNRI" OR "s.n.r.i." OR "s.s.r.i." OR serotonin OR mood OR “anti-anxiety” OR antidepress*
36	divorce* OR "foster care" OR "foster family" OR homeless* OR unhous* OR ((difficult OR broken) w/5 (famil* OR home*))
37	(Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR (social* W/3 distanc*)) w/15 (sad* OR depress* OR anxi* OR stress* OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone)
38	"time spent" OR "engagement" OR (watch* w/2 time) OR impression* OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "MAU" OR "DAU" OR "MAP" OR "DAP" OR "WAU" OR "WAP"
39	addict* OR staytime OR timespent OR "time spent" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control"
40	screen w/10 (time OR manag* OR control* OR limit) OR screentime

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

41	"prefrontal cortex" OR "cognitive development" OR neuroadaptation
42	(detect* or develop*) w/3 (age OR brain*)
43	"emotion study" OR "personalized feedback"
	Other Terms
44	polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* or criminal OR charges OR conviction* OR arrest* OR “law enforcement”
45	positive* w/3 messag*
46	deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR "cover up"
47	"Consumer Protection Act" OR "consumer protection" OR (consumer w/5 protect*)
48	design w/3 (persuasive OR coercive)

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024 (with the limited exception for the Department of Child Safety based on the founding date provided by the agency), which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (*) have been proposed by the Arizona AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Board of Education	Sean Ross*	Executive Director
Board of Education	Bruce DuPlanty*	Deputy Director
Board of Education	Tom Horne* (AZ-proposed DOE custodian)	Superintendent
Board of Education	Dr. Jacqui Clay	County School Superintendent
Board of Education	Dr. Scott Hagerman	High School District Superintendent
Board of Education	Dr. José Luis Cruz Rivera	University President
Board of Education	Jessica Mueller	Research and Data Analyst
Board of Education	Shannon Etz	Project Director of Constituent Services
Board of Education	Federico Yanez	Project Director of Policy
Dept. of Education	Tom Horne*	Superintendent of Public Instruction
Dept. of Education	Margaret Garcia Dugan*	Deputy Superintendent
Dept. of Education	Art Harding*	Chief Operations Officer
Dept. of Education	Edward Cota*	Chief Strategy Officer

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

Agency	Custodian	Title
Dept. of Education	Sid Bailey*	Arizona Educator Leadership
Dept. of Education	Catherine Barrett*	Academic Achievement
Dept. of Education	Colette Chapman*	ESS/Child and Adult Programs
Dept. of Education	Joseph Guzman*	Accountability
Dept. of Education	Debbie Jackson*	Deputy Operations Officer
Dept. of Education	Mike Kurtenbach*	DAS School Safety
Dept. of Education	Mila Makal*	Director Character Education
Dept. of Education	Rick Medina*	Community Relations Manager
Dept. of Education	Doug Nick*	Communications Director
Dept. of Education	Camilla Strongin*	Director of Legislative Affairs
Dept. of Education	Bobby Bravo*	Deputy Director Legislative Affairs
Dept. of Education	Michelle Udall*	School Improvement
Dept. of Education	John Ward*	ESA Executive Director
Dept. of Education	Jim Waring*	Fed./State Liaison and Community Outreach
Dept. of Education	Mark Hodge	Title IV – Student Support & Academic Enrichment
Dept. of Education	Rhae Lynne Clawson	21st Century Community Learning Centers
Dept. of Education	Melissa Conner	Health and Nutrition Services
Dept. of Education	Cara Alexander	Health and Nutrition Services
Dept. of Child Safety	Sara Perry*	Sr. Division Administrator – Chief Health Services Officer
Dept. of Child Safety	Sara Park*	Chief Medical Officer

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

Agency	Custodian	Title
Dept. of Child Safety	Karla Mouw*	Assistant Director – CHP
Dept. of Child Safety	Frank Sweeney*	Assistant Director – Information Technology
Dept. of Child Safety	Megan Conrad*	DCS Program Manager – Extended Foster Care
Dept. of Child Safety	Reynaldo Saenz*	Assistant Director – Comptroller
Dept. of Child Safety	Jessica Anthony*	Ombudsman
Dept. of Child Safety	Tanya Abdellatif*	DCS Assistant Director of Foster Care & Post Permanency Support
Dept. of Child Safety	Gillian Vanasse*	DCS Chief Operating Officer
Dept. of Child Safety	Barbara Guillen*	Permanency and Youth Services Manager
Dept. of Child Safety	Rebecca Krumm*	Acting Assistant Director, Office of Accountability
Dept. of Child Safety	Chris Gustafson*	Chief Legislative Liaison
Dept. of Child Safety	David Lujan*	Deputy Director
Dept. of Child Safety	Shalom Jacobs*	Deputy Director
Dept. of Child Safety	Greg McKay*	Director
Dept. of Child Safety	Mike Faust*	Director
Dept. of Child Safety	Kylah Ross-Mount*	Training Administrator

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

Agency	Custodian	Title
Dept. of Child Safety	Charles Flanagan*	Director
Dept. of Child Safety	Matthew Stewart*	Director
Dept. of Health Services	Jennifer Cunico*	Director
Dept. of Health Services	Sheila Sjolander*	Deputy Director, Public Health Services
Dept. of Health Services	Celia Nabor*	Assistant Director, Prevention Services
Dept. of Health Services	Lisa Villarroel*	Chief Medical Officer for Public Health
Dept. of Health Services	Susan Robinson*	Chief Strategy and Innovation Officer
Dept. of Health Services	Carly Fleege*	Legislative Liaison
Dept. of Health Services	Stacie Gravito*	Administrative Counsel and Chief, Office of Administrative Counsel & Rules
Dept. of Health Services	Kimberly Reid*	Administrative Counsel
Dept. of Health Services	Mckenna Baker*	Administrative Counsel
Dept. of Health Services	Stephanie Walaszek*	Marketing Coordinator & Interim Communications Director
Dept. of Health Services	Martin Celaya*	Chief, Bureau of Assessment and Evaluation
Dept. of Health Services	Emily Carlson*	Office of Tobacco Prevention and Cessation, Bureau of Chronic Disease

MDL 3047 – 2024-12-09 Agency Discovery JLB
Arizona – Meta Proposal

Agency	Custodian	Title
		and Health Promotion, Division of Prevention Services
Dept. of Health Services	Teresa Manygoats*	Bureau Chief, Chronic Disease and Health Promotion, Division of Prevention Services
Dept. of Health Services	Angie Lorenzo*	Chief, Office of Women's Health
Dept. of Health Services	Laura Luna Bellucci*	Bureau Chief, Women's and Children's Health, Division of Prevention Services
Dept. of Health Services	Stephanie Elzenga*	General Counsel
Dept. of Health Services	Ravi Pitti *	Chief Data Officer

Arizona State Agency Proposals for Search Terms and Custodians

Arizona Department of Education (“ADE”)

ADE Search Term Proposal:

("social media" OR "social network" OR Meta OR Facebook OR Instagram OR Insta OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR wire OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM OR videogame OR gaming)

AND

(advers* w/10 experience* OR ACE*)

OR

“body image”

OR

anorexi* OR bulimi*

OR

(mental w/3 health) OR "TMH" OR (psych* w/10 (concern* OR issue*))

OR

"negative spiral"

OR

"social reward*" OR "social approval"

OR

"social connectedness" w/10 (limit* OR decrease* OR less*)

OR

health w/5 (interact* OR behavior OR online)

OR

NCII OR “non-consensual intimate imagery”

OR

(hate*) w/25 (crime OR attack* OR conduct* OR misconduct*)

OR

"SSRI" OR "SNRI" OR serotonin OR OR “anti-anxiety medication” OR antidepressant

OR

(Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR (social* W/3 distanc*)) w/15 (sad* OR depress* OR anxi* OR stress* OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone)

OR

"daily active users

OR

Addicted

OR

screen w/10 (time OR manag* OR control* OR limit) OR screentime

OR

"cognitive development" w /3 (impair or impede)

OR

"emotion study" OR "personalized feedback"

ADE Custodian Proposal:

1. Tom Horne, Superintendent of Public Instruction
2. Margaret Garcia Dugan, Deputy Superintendent
3. Art Harding, Chief Operations Officer
4. Edward Cota, Chief Strategy Officer
5. Sid Bailey, Arizona Educator Leadership
6. Catherine Barrett, Academic Achievement
7. Colette Chapman, ESS/Child and Adult Programs
8. Joseph Guzman, Accountability
9. Debbie Jackson, Deputy Operations Officer
10. Mike Kurtenbach, DAS School Safety
11. Mila Makal, Director Character Education
12. Rick Medina, Community Relations Manager
13. Doug Nick, Communications Director
14. Camilla Strongin, Director of Legislative Affairs
15. Bobby Bravo, Deputy Director Legislative Affairs
16. Michelle Udall, School Improvement
17. John Ward, ESA Executive Director
18. Jim Waring, Fed./State Liaison and Community Outreach

Arizona Department of Child Safety (“DCS”)

DCS previously proposed the below sets of search terms and custodians, but without the benefit of running test searches due to the intervening holiday and limited staff resources. DCS now suspects that this proposal would result in millions of hits, including documents related to individual-child case files or other non-responsive material. DCS now believes that more limited targeted searches and “go get ems” are the only feasible way for DCS to identify any studies, research, or aggregate data that Meta has indicated it wants from the Department of Child Safety.

DCS Search Term Proposal (Redline of Meta proposed terms)

1. (produc* OR induc* OR caus* OR impact OR effect OR because OR "lead to" OR result* OR precipitat* OR provok* OR create* OR "bring about" OR "give rise to" OR promot* OR generate OR relat* OR factor* OR contrib*) NEAR(10) Meta revised Search Set 1
2. (produc* OR induc* OR caus* OR impact OR effect OR because OR "lead to" OR result* OR precipitat* OR provok* OR create* OR "bring about" OR "give rise to" OR promot* OR generate OR relat* OR factor* OR contrib*) NEAR(10) Meta revised Search Set 2, 2-14 individually.
3. (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Netflix OR Reddit OR Pinterest OR Tumblr DM OR “direct message”) NEAR(10) (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR ansi* OR anti-ansi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR

“BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)

I. Search Strings for Youth Focused Agencies

<i>Search Set 1 – Youth Use of Social Media</i>	
1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Netflix OR Reddit OR Pinterest OR Tumblr OR DM OR “direct message”)
<i>Search Set 2 – Youth Mental Health / Wellbeing Issues</i>	
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anx* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3.	(“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5.	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6.	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))

10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

Search Set 3 – Other Case Issues

15.	
-----	--

II. Search Strings for Non-Youth-Focused Agencies

All search strings referenced above run against below “Youth” gating terms with “AND” connector.

--

DCS Custodian Proposal

1. Sara Perry	Sr. Division Administrator – Chief Health Services Officer
2. Sara Park	Chief Medical Officer
3. Karla Mouw	Assistant Director - CHP
4. Frank Sweeney	Assistant Director – Information Technology
5. Megan Conrad	DCS Program Manager – Extended Foster Care
6. Katherine Guffey	Sr. Executive Consultant/Formal Head of Consultation and Research
7. Reynaldo Saenz	Assistant Director - Comptroller
8. Jessica Anthony	Ombudsman
9. Cindy Copp	Former Ombudsman
10. Casey Melsek	Former Ombudsman
11. Tanya Abdellatif	DCS Assistant Director of Foster Care & Post Permanency Support
12. Gillian Vanasse	DCS Chief Operating Officer
13. Barbara Guillen	Permanency and Youth Services Manager
14. Rebecca Krumm	Acting Assistant Director, Office of Accountability
15. Chris Gustafson	Chief Legislative Liaison
16. Melissa Compian	Policy Manager/Formal Legislative Liaison

17. Chanetta Curtis	Former Deputy Legislative Liaison
18. Joshua Tucker	Former Legislative Liaison
19. Magdalena Jorquez	Former Legislative Liaison
20. Illya Riske	Former Legislative Liaison
21. David Lujan	Deputy Director
22. Greg McKay	Former Director
23. Mike Faust	Former Director
24. Matthew Stewart	Former Director
25. Michael Wischart	Former Acting Director
26. Shalom Jacobs	Former Deputy Director
27. Kylah Ross-Mount	Training Administrator
28. Karen Bulkeley	Policy Administrator
29. Dr. Sala Webb	Former CMDP Behavioral Health Medical Director
30. Dr. Susan Stephens	Former CMDP Medical Director
31. Christi Shelton	Assistant Director
32. Pauline Machiche	Former Deputy Director

Arizona Board of Education (“BoE”)

BoE Search Term Proposal

- Meta
- Facebook
- Instagram
- Snapchat
- Snap
- TikTok
- YouTube
- BeReal
- Discord
- GroupMe
- Kik
- Pinterest
- Omegle
- Reddit
- Twitch
- Tumblr
- WhatsApp
- Twitter
- YikYak
- “social media”
- “mental health”

BoE Custodian Proposal

1. Sean Ross, Executive Director
2. Bruce DuPlanty, Deputy Director

3. Shannon Etz, Project Director of Constituent Services

Arizona Department of Health Services (“DHS”)

DHS Search Term Proposal

- Meta
- Facebook
- Instagram
- Snapchat
- Snap
- TikTok
- YouTube
- BeReal
- Discord
- GroupMe
- Kik
- Pinterest
- Omegle
- Reddit
- Twitch
- Tumblr
- WhatsApp
- Twitter
- YikYak
- “social media”
- “mental health”

DHS Custodian Proposal

1. Jennifer Cunico; Director
2. Sheila Sjolander; Deputy Director, Public Health Services
3. Celia Nabor; Assistant Director, Prevention Services
4. Lisa Villarroel; Chief Medical Officer for Public Health
5. Susan Robinson; Chief Strategy and Innovation Office
6. Carly Fleege; Legislative Liaison
7. Stacie Gravito; Administrative Counsel and Chief, Office of Administrative Counsel & Rules
8. Kimberly Reid; Administrative Counsel
9. McKenna Baker; Administrative Counsel
10. Stephanie Walaszek; Marketing Coordinator & Interim Communications Director
11. Martin Celaya; Chief, Bureau of Assessment and Evaluation
12. Emily Carlson; Office of Tobacco Prevention and Cessation, Bureau of Chronic Disease and Health Promotion, Division of Prevention Services
13. Teresa Manygoats; Bureau Chief, Women’s and Children’s Health, Division of Prevention Services
14. Angie Lorenzo; Chief, Office of Women’s Health

15. Laura Luna Bellucci; Bureau Chief, Women's and Children's Health, Division of Prevention Services
16. Stephanie Elzenga ; General Counsel
17. Ravi Pitti; Chief Data Officer

1
2
3
4
5
6
7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
10

11 People of the State of California, et al.

MDL No. 3047

12 v.

13 Meta Platforms, Inc.; Instagram, LLC; Meta
14 Payments, Inc.; Meta Platforms Technologies,
15 LLC,

Case Nos. 4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

16 **DECLARATION OF MARK EWY**

17 Office of the Attorney General, State of Florida,
18 Department of Legal Affairs

Judge: Hon. Yvonne Gonzalez Rogers

19 v.

20 Meta Platforms, Inc., Instagram, LLC., Meta
21 Payments, Inc.

Magistrate Judge: Hon. Peter H. Kang

22 State of Montana, *ex rel.* Austin Knudsen,
23 Attorney General

24 v.

25 Meta Platforms, Inc., Instagram, LLC, Facebook
26 Holdings, LLC, Facebook Operations, LLC,
27 Meta Payments, Inc., Meta Platforms
28 Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION THIS
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

1 I, MARK EWY, hereby declare and state as follows:

- 2 1. I am the Program Administrator for General Legal Services for the Arizona
3 Department of Child Safety (DCS), a position I have held since 2007.
- 4 2. DCS is an agency created by the Arizona Executive Branch on May 29, 2014. DCS
5 is subject to mandates by the Arizona legislature and federal law and exists to protect
6 children subjected to abuse and neglect.
- 7 3. In my position, I am responsible for over seventy employees with the Central
8 Records Coordination Unit within DCS, which manages records collection and
9 distribution, including production of records responsive to public records requests
10 and litigation (whether against DCS or pursued by DCS).
- 11 4. I am also responsible for providing technical assistance to the DCS Director,
12 Deputies, and Department units and programs regarding litigation matters involving
13 DCS.
- 14 5. As part of my job duties and responsibilities, I was asked to review the subpoena
15 from Meta Platforms, Inc. to DCS in the matter of *People of the State of California,*
16 *et.al. v. Meta Platforms, Inc. et. al.*, Case No.: 4:23-cv-05448, Civil Action No. 4:22-
17 MD-03047-YGR, in order to facilitate production and determine the feasibility of
18 production of the demanded records.
- 19 6. In addition to the general and specific objections DCS served on Meta on August 7,
20 2024, I have determined the following regarding the challenges and burdens of
21 responding to the subpoena for documents and/or conducting electronic searches:
- 22 • Searches of email, OneDrive, and SharePoint are contained within the Microsoft
23 Government Community Cloud environment and are conducted using the Microsoft
24 eDiscovery tool.
- 25 • DCS is subject to the limitations of Microsoft's eDiscovery tool. This tool will
26 accept up to 20 search strings per search. Time required to complete searches is
27 dependent upon the number of items being searched, keywords, and complexity of
28 the search parameters. The quality of the search string will directly impact both the
result and should be considered prior to submission. Additional efforts may be
required to provide hit reports and may directly impact timelines.
- Exports are limited to a maximum of 2TB.
- Microsoft's e-Discovery tool does not consistently produce a 'hit report.' Using the
tool, searches often must be run more than once to compare results to ensure
accuracy, placing a burden on DCS resources.
- Although DCS can attempt to deduplicate search results, the Microsoft e-Discovery
tool does not provide any guarantee that the deduplication process does not

erroneously eliminate responsive documents such that the burden on DCS IT to validate deduplication results is onerous.

- DCS has many different priorities and searches are subject to resource availability. Given the critical work of child safety and child welfare, priority is always given to open and/or critical cases to ensure permanency and child well-being are ensured. Staffing resources are subject to budget constraints, competing priorities, and legislative and executive branch mandates. Staffing resources are currently limited to no more than two individuals to conduct these searches.
- Despite the above identified limitations, in an effort to comply with discovery deadlines, DCS undertook running several sample searches using some of the revised search terms Meta provided for the first time on Friday, November 22. However, due to the very limited notice provided by Meta, coupled with staff availability over the Thanksgiving holiday and other high priority searches, DCS was able to complete 3 sample searches, without formalized hit reports. I have been informed that information on the excessive number of hits resulting from those searches was provided to Meta during the most recent conference call on December 3.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 6, 2024, in Maricopa County, Arizona.


MARK EWY